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Attorneys for Plaintiff
Karma Automotive LLC

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

KARMA AUTOMOTIVE LLC,

Plaintiff,

v.

POWERSOURCE LLC; and DOES 1–5, inclusive,

Defendants.

Case No. 8:16-cv-00530-TJH-MRW

PLAINTIFF KARMA AUTOMOTIVE LLC'S NOTICE OF MOTION AND MOTION FOR VOLUNTARY DISMISSAL WITHOUT PREJUDICE PURSUANT TO FED. R. CIV. P. 41(A)(2)

Date: June 5, 2017
Time: UNDER SUBMISSION
Courtroom: 17
Judge: Hon. Terry J. Hatter, Jr.

Trial Date: None
Action Filed: March 21, 2016

TO DEFENDANT POWERSOURCE LLC AND ITS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on June 5, 2017 or as soon thereafter as the matter may be heard before the Honorable Terry J. Hatter, Jr. in Courtroom 17 of the above-captioned Court, located at 312 N. Spring Street, Los Angeles, California, 90012, plaintiff Karma Automotive LLC ("Karma") will, and hereby does, move this Court for an order permitting Karma to voluntarily dismiss this action without prejudice, pursuant to Federal Rule of Civil Procedure 41(a)(2).

This motion is made following the conference of counsel pursuant to L.R. 7-3, which took place on April 13, 2017, which was followed by several further meet and confer attempts, including email correspondence and another conference of counsel on April 26, 2017, throughout which PowerSource would not agree to stipulate to a dismissal. The Motion is based on this Notice of Motion and Motion, and the concurrently filed Memorandum of Points and Authorities in support thereof, and all files and records in this case, and on any further briefing or argument that may be presented at or before the hearing on the motion.

Dated: April 27, 2017

VEDDER PRICE (CA), LLP
GERMAIN D. LABAT
DEBORAH A. HEDLEY
CHRISTOPHER R. RAMOS

By: */s/ Germain D. Labat*
GERMAIN D. LABAT

Attorneys for Plaintiff
Karma Automotive LLC

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2017, a copy of the foregoing **PLAINTIFF KARMA AUTOMOTIVE LLC'S NOTICE OF MOTION AND MOTION FOR VOLUNTARY DISMISSAL WITHOUT PREJUDICE PURSUANT TO FED. R. CIV. P. 41(A)(2)** was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Germain D. Labat
GERMAIN D. LABAT